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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2013-614*

13 **KATHRYN LYNN HALL**  
14 **1 Johnson Lane**  
15 **Machiasport, ME 04655**

**A C C U S A T I O N**

16 **Registered Nurse License No. 714155**

Respondent.

17  
18 Louise R. Bailey, M.Ed., RN ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the Executive  
21 Officer of the Board of Registered Nursing ("Board"), Department of Consumer Affairs.

22 2. On or about October 18, 2007, the Board issued Registered Nurse License Number  
23 714155 to Kathryn Lynn Hall ("Respondent"). The license was in full force and effect at all  
24 times relevant to the charges brought herein. The license will expire on June 30, 2013, unless  
25 renewed.

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1 **JURISDICTION**

2 3. Business and Professions Code ("Code") section 2750 provides, in pertinent part, that  
3 the Board may discipline any licensee, including a licensee holding a temporary or an inactive  
4 license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing  
5 Practice Act.

6 4. Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
7 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
8 to render a decision imposing discipline on the license. Under Code section 2811(b), the Board  
9 may renew an expired license at any time within eight years after the expiration.

10 **STATUTORY PROVISIONS**

11 5. Code section 2761 states, in pertinent part:

12 "The board may take disciplinary action against a certified or licensed nurse or deny an  
13 application for a certificate or license for the following:

14 (a) Unprofessional conduct....

15 (4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action  
16 against a health care professional license or certificate by another state or territory of the United  
17 States, by any other government agency, or by another California health care professional  
18 licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that  
19 action."

20 **COST RECOVERY**

21 6. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
22 administrative law judge to direct a licentiate found to have committed a violation or violations of  
23 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
24 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being  
25 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
26 included in a stipulated settlement.

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1 FIRST CAUSE FOR DISCIPLINE

2 (Out-of-State Discipline)

3 7. Respondent is subject to discipline under Code section 2761(a)(4), in that effective  
4 January 21, 2011, pursuant to an Agreed Order issued by the Kentucky Board of Nursing, in a  
5 disciplinary proceeding titled *In Re: Kathryn L. Greer Hall, Case No. 2010-1406*, Respondent  
6 was reprimanded and placed on terms and conditions. The Order was based on information  
7 received from the Maine State Board of Nursing, reporting that while Respondent was on  
8 assignment at Maine General Medical Center, located in Augusta, Maine, Respondent was  
9 terminated due to professional misconduct, false documentation, and failure to follow hospital  
10 policy while administering intravenous medications. The Order is attached hereto as **Exhibit A**  
11 and incorporated herein by reference.

12 PRAYER

13 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,  
14 and that following the hearing, the Board of Registered Nursing issue a decision:

- 15 1. Revoking or suspending Registered Nurse License Number 714155, issued to  
16 Kathryn Lynn Hall;
- 17 2. Ordering Kathryn Lynn Hall to pay the Board of Registered Nursing the reasonable  
18 costs of the investigation and enforcement of this case, pursuant to Code section 125.3; and,
- 19 3. Taking such other and further action as deemed necessary and proper.

20 DATED: FEBRUARY 13, 2013

21 *for* *Louise R. Bailey*  
22 LOUISE R. BAILEY, M.ED., RN  
23 Executive Officer  
24 Board of Registered Nursing  
25 Department of Consumer Affairs  
26 State of California  
27 Complainant  
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